IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

MIGUEL RODRIGUEZ,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	CIVIL ACTION NO. 7:17-CV-00158
STANDARD GUARANTY INSURANCE	§	
COMPANY,	§	
	§	
Defendant.	§	

JOINT NOTICE OF SETTLEMENT AND MOTION TO CONTINUE PRETRIAL DEADLINES

Plaintiff Miguel Rodriguez and Defendant Standard Guaranty Insurance Company (the "Parties") file this Joint Notice of Settlement and Motion to Continue the Pretrial Deadlines as follows:

The parties recently reached a settlement in principle related to all matters raised in this lawsuit, and request that the Court continue the Deadline to file a Joint Pretrial Order, currently scheduled for November 29, 2017, and the Pretrial Conference, currently scheduled for December 6, 2017, for sixty (60) days so that the parties may properly prepare and execute a final settlement agreement. The Parties anticipate filing a stipulation of dismissal in this matter upon execution of the final settlement agreement.

Respectfully submitted,

/s/ Michael Lawrence w/ permission

Larry Lawrence
State Bar No. 00794145
Michael Lawrence
State Bar. No. 24055826
LAWRENCE LAW FIRM
3112 Windsor Rd., Suite A234
Austin, Texas 78703

Telephone: (956) 994-0057 Facsimile: (800) 507-4152

Dan Cartwright

State Bar No. 03942500

Lory Sopchak

State Bar No. 24076706

CARTWRIGHT LAW FIRM, LLP

1300 Post Oak Blvd., Suite 760

Houston, Texas 77056

Telephone: (713) 840-0950

Facsimile: (713) 840-0046

ATTORNEYS FOR PLAINTIFF

EDISON, McDowell & Hetherington LLP

By: /s/ Bradley J. Aiken

Bradley J. Aiken

State Bar No. 24059361

Federal Bar No. 975212

Pooneh A. Momeni

State Bar No. 24098123

1001 Fannin Street, Suite 2700

Telephone: 713-337-5580 Facsimile: 713-337-8850 Brad.aiken@emhllp.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on November 27, 2017, on the following counsel of record by the Court's CM/ECF:

Larry Lawrence Michael Lawrence Lawrence Law Firm 3112 Windsor Rd., Suite A234 Austin, Texas 78703 Dan Cartwright Lory Sopchak Cartwright Law Firm, LLP 1300 Post Oak Blvd., Suite 760 Houston, Texas 77056

/s/ Pooneh A. Momeni

Pooneh A. Momeni